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Temporary Conservator of the Person and
Temporary Co-Conservator of the Estate

FILED
LOS ANGELES SUPERIOR COURT

MAR 10 2008
JOHN A. CLARKE, CLERK
A. Murdock
BY ANDREA MURDOCK, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

In re the Conservatorship of the Person and
Estate of

BRITNEY JEAN SPEARS,

Temporary Conservatee.

Case No. BP 108870

**EX PARTE APPLICATION FOR ORDER
AUTHORIZING:**

**(1) PAYMENT OF \$2,500 PER WEEK TO
JAMES P. SPEARS;
(2) LEASE OF VEHICLE FOR BENEFIT
OF TEMPORARY CONSERVATEE;
(3) CREDIT OR DEBIT CARD OF \$1,500
PER WEEK TO TEMPORARY
CONSERVATEE; AND
(4) PAYMENT OF \$25,000 RETAINER TO
HOLLAND & KNIGHT LLP**

Date: March 5 & 10, 2008
Time: 1:30 p.m.
Dept.: 9
Judge: Hon. Reva Goetz, Judge Pro Tem

James P. Spears, as the Temporary Conservator of the Person and Temporary Co-
Conservator of the Estate of Britney Jean Spears respectfully submits his Ex Parte Application for
Order Authorizing (1) Payment of \$2,500 Per Week to James P. Spears, without prejudice; (2)
Lease of Vehicle for Benefit of Temporary Conservatee; (3) Credit/Debit Card of \$1,500 per
Week to Temporary Conservatee; and (4) Payment of \$25,000 Retainer to Holland & Knight LLP
as follows:

FILED
MAR 10 2008
RECEIVED
DATE PAID: 03/11/08 02:25 PM
PAYMENT: \$0.00
RECEIPT #: F1924100032
CASE: BP108870 LE/NEH

1 **Introduction and Statement of Facts**

2 On February 1, 2008, the Court appointed Mr. Spears Temporary Conservator of the
3 Person of Britney Jean Spears, and appointed Mr. Spears and Andrew M. Wallet Temporary Co-
4 Conservators of the Estate of Ms. Spears. Since that date, the temporary conservatorship has been
5 extended, and letters of temporary conservatorship of Ms. Spears' person and estate have been
6 extended to Messrs. Spears and Wallet consistent with the Court's orders. Mr. Spears has been the
7 duly appointed and acting temporary conservator of the person of Ms. Spears, and Mr. Spears and
8 Mr. Wallet have been the duly appointed and acting temporary co-conservators of the estate of
9 Ms. Spears.

10 Since February 1, 2008, numerous and significant issues have arisen that have taken
11 considerable efforts to address. As a result of the demands of the conservatorship, Mr. Spears has
12 devoted substantial time and energy to such issues. He has worked nonstop on matters in
13 connection with Ms. Spears' person and estate and as a result, has been unable to work his normal
14 job at all. Mr. Spears therefore requests payment from the conservatorship estate in the amount of
15 \$2,500 per week on account.

16 During the temporary conservatorship, one issue that Mr. Spears has been dealing with is
17 the inadequacy of the cars that Ms. Spears owns to meet her security and travel needs. Another
18 concern is to provide Ms. Spears with an appropriate level of financial independence. Mr. Spears
19 therefore respectfully requests that he, in his capacity as a Temporary Co-Conservator of the
20 Estate, be authorized to lease a vehicle that is appropriately sized to accommodate Ms. Spears'
21 travel and security needs, and to provide Ms. Spears with a credit or debit card with a weekly
22 maximum of \$1,500, for Ms. Spears' personal use at her sole discretion. Further, Mr. Spears has
23 just learned that default judgments were entered against Ms. Spears individually and Britney
24 Touring, Inc., one of Ms. Spears' entities, in a Florida state court. Mr. Spears therefore requests
25 the authority to retain the law firm of Holland & Knight LLP and to pay a retainer to the firm in
26 the amount of \$25,000.

27 **Compensation for Mr. Spears**

28 Since Mr. Spears' appointment as the Temporary Conservator of the Person and

1 Temporary Co-Conservator of the Estate of Ms. Spears, Mr. Spears has been working nearly 24
2 hours, 7 days a week. Mr. Spears has had to effectively abandon his livelihood in order to attend
3 to his daughter's personal and financial needs, as the Temporary Conservatorship requires. Mr.
4 Spears therefore requests the authority to be advanced on account from the conservatorship estate,
5 effective March 3, 2008, the amount of \$2,500.00 per week, without prejudice.

6 Mr. Spears' occupation prior to his appointment as Ms. Spears' Temporary Conservator of
7 the Person and Temporary Co-Conservator of the Estate was that of a caterer/personal chef. Mr.
8 Spears has been able to work only three days in the past approximate six weeks, and has had to
9 resign from each of his regular employers and clients. He worked on the afternoon of the
10 Superbowl (Feb. 3), and then was able to work at two dinner parties, both of which were
11 scheduled with him on very short notice. His salary is \$65 per hour for an average shift of 6.5
12 hours per day, 6 to 7 days a week, which is at least \$2,535 per week.

13 It is in the best interests of Ms. Spears that the Court authorize that Mr. Spears be advanced
14 on account \$2,500.00, so that he can properly pay his expenses and bills, including the rent on his
15 home, since Mr. Spears currently has no income or alternate method of earning money. (Prob.
16 Code, § 2640.) Mr. Spears needs regular income in order to pay his recurring expenses, including
17 but not limited to his rent, automobile expenses, healthcare expenses, and other such bills. Mr.
18 Spears therefore respectfully requests an advance on account, effective March 3, 2008, the amount
19 of \$2,500 per week, without prejudice, as such amounts are just and reasonable given the
20 circumstances.

21 **Authority to Lease a Vehicle**

22 Mr. Spears, as Temporary Co-Conservator of Ms. Spears' Estate, requests the authority to
23 lease an appropriate-sized vehicle to accommodate Ms. Spears' travel needs. Since the
24 establishment of the temporary conservatorship on February 1, 2008, Ms. Spears has had round-
25 the-clock security guards, including those who travel with her in various of her cars. When Ms.
26 Spears travels, she is accompanied by security guards, in addition to any guests with whom she
27 may be traveling. If Ms. Spears travels by car, the car must have at least enough room space to
28 accommodate all such passengers for any given trip. None of Ms. Spears' current cars provide for

1 such accommodations, and in fact most of her cars will only fit two people.

2 An additional reason Ms. Spears needs a larger vehicle is to protect and shield her
3 sufficiently from the paparazzi, who pursue Ms. Spears relentlessly. A larger vehicle would
4 provide greater protection from the paparazzi because it has greater ground clearance to protect
5 Ms. Spears from paparazzi dangling or lording over the car, and Ms. Spears' exposure to the
6 public could be better restricted by its size.

7 It is in the best interests of Ms. Spears that Mr. Spears be authorized and allowed to lease
8 a vehicle that is appropriately sized to accommodate Ms. Spears' travel needs. Mr. Spears
9 therefore respectfully requests the authority to lease a vehicle that can appropriately accommodate
10 Ms. Spears' security needs when she travels by vehicle.

11 **Credit/Debit Card for Ms. Spears**

12 Ms. Spears should have an appropriate amount of financial independence. Mr. Spears
13 requests that the Temporary Co-Conservators of the Estate be authorized to provide Ms. Spears
14 with \$1,500 per week for her personal spending in her sole discretion, through a credit or debit
15 card issued in her name alone, and for which the Temporary Co-Conservators of the Estate do not
16 have to account. Mr. Spears, as a Temporary Co-Conservator of the Estate, would select either a
17 credit or debit card, based upon which type of card would provide more protection to Ms. Spears
18 (from identity theft, for example).

19 **\$25,000 Retainer for Holland & Knight LLP**

20 Mr. Spears has learned that that default judgments have been entered against Ms. Spears
21 individually and Britney Touring, Inc. ("Britney Touring"), which is an entity that Ms. Spears
22 owns in litigation in a Florida state court. Mr. Spears learned that the default judgments were
23 entered on February 14, 2008, in Case No. 48-2007-CA-014233-O, Division 32, in *Wright*
24 *Entertainment Group, LLC and Wright Entertainment Group, Inc. vs. Britney Spears and Britney*
25 *Touring, Inc.* Holland & Knight LLP has expertise in dealing with issues relating to entertainment
26 law, including the instant proceeding in Florida. Mr. Spears requests the authority to retain the
27 law firm of Holland & Knight LLP and to pay the firm a retainer in the amount of \$25,000, to
28 respond appropriately to the default judgments that were entered against Ms. Spears individually

1 and Britney Touring.

2 **Conclusion**

3 The Probate Code authorizes the Court to make orders in the best interests of the
4 Temporary Conservatee. Granting Mr. Spears' ex parte application would be in the best interests
5 of Ms. Spears. Based upon the foregoing, Mr. Spears respectfully requests an order authorizing
6 (1) Payment of \$2,500 Per Week to James P. Spears, without prejudice; (2) Lease of Vehicle for
7 Benefit of Temporary Conservatee; (3) Credit/Debit Card of \$1,500 per Week to Temporary
8 Conservatee; and (4) Payment of \$25,000 Retainer to Holland & Knight LLP.

9 Dated: March 10, 2008

LUCE, FORWARD, HAMILTON & SCRIPPS LLP

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11
12 By: 

Vivian L. Thoreen

Attorneys for James P. Spears, Temporary Conservator
of the Person and Temporary Co-Conservator of the
Estate of Britney Jean Spears

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